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U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Case No.: 21-CR46

United States,                 )  
Versus                                 )  
Lotofolah K. Afrasiabi         )  
Defendant.                         )

**DEFENDANT'S MOTION TO DISMISS STANDBY ATTORNEY SABRINA SCHROFF AND TO APPOINT A NEW  
STANDBY ATTORNEY**

Now comes the Defendant Afrasiabi, Pro Se, and herein prays the court to dismiss attorney Sabrina Schroff as the standby counsel in this instant action and to appoint a new standby counsel. As indicated in the Defendant's Letter to the Court on the Lack of Assistance by Standby Attorney Schroff, Defendant is very frustrated by a standby attorney who has been constantly preoccupied with other cases with little or no time to allocate to this case, who has misled the Defendant about a non-existing trial in December, used as an excuse for over two months to justify inaction, who has clearly been non-responsive vis-à-vis the Defendant's numerous questions, who has ex-communicated the Defendant simply because the Defendant disagreed with her lame explanation regarding a potential witness, Mr. Salman Rushdie, who appears to have a conflict of interest given the hints of personal familiarity with Mr. Rushdie, who has dragged her feet for several crucial months to have a single trial-related session with the Defendant, who has simultaneously abused her standby role by ignoring the Defendant's repeated request to file certain medical documents sent to her as exhibits attached to one of Defendant's motions, who has caused a great deal of emotional pain and anxiety by her evasiveness and her lack of forthrightness, and the like.

In terms of the chronology of Defendant's interactions with attorney Schroff, Defendant turns the court's attention to Exhibit No. 1, Emails and Texts exchanged with attorney Schroff, reflecting the following facts:

1. In early and mid-November, 2022, Defendant repeatedly reached out to attorney Schroff for help and expressed hope that such a help would be forthcoming.

2. Unfortunately, Defendant's hopes and expectations have not been born out. Attorney Schroff has been extremely difficult to get in touch with and that is reflected in several of Defendant's text stating "why should it take 20 emails to set up a conference?" Not only that, repeatedly attorney Schroff set up conference and then cancelled, case in point two Sundays in a row she cancelled a conference call with the Defendant by stating that she had to attend a funeral, or that "her aunt back home" had died, etc.
3. For nearly two months, attorney Schroff evaded her responsibility to assist the Defendant with pre-trial preparation citing her trial "in December" and, yet, in early January 2023, only after Defendant searched the court docket and asked if attorney Schroff had a trial in December, she reluctantly admitted that she did not.
4. Furthermore, attorney Schroff has consistently dodged Defendant's questions and dragged her feet on various pre-trial issues, thus leading the Defendant to the inevitable conclusion that he cannot count on legal assistance by attorney Schroff.

Wherefore, Defendant prays the court to allow this motion.

Respectfully,

Lotfolah Kaveh Afrasiabi, Pro Se

January, 29, 2023

CC" US Attorney